

**United States Department of the Interior  
Bureau of Land Management**

---

**Pryor Mountain Wild Horse Range Non-Helicopter Gather  
Scoping Report November 2011**



U.S. Department of the Interior  
Bureau of Land Management  
Billings Field Office  
5001 Southgate Drive  
Billings, Montana 59101  
Phone: 406-896-5013  
FAX: 406-896-5281



## **INTRODUCTION**

The Bureau of Land Management (BLM) Billings Field Office issued a scoping notice on July 28, 2011, to begin the initial stages of an environmental analysis for a proposed non-helicopter capture and removal operation of excess wild horses on the Pryor Mountain Wild Horse Range (PMWHR). The 30-day scoping period, from August 1-30, 2011, encouraged the public to provide input that would assist the BLM in developing a proposed action and alternatives (including type of capture techniques), further identify issues, potential environmental consequences, mitigation opportunities, monitoring, or provide information, data, or analysis to be used in the development of an Environmental Analysis (EA) for the wild horse gather.

This Scoping Report addresses the substantive comments received during the scoping period and allows an opportunity to view a summary of the public's comments and the BLM's responses. Although numerous individuals provided scoping input, the majority of the comments are nearly identical or at least similar.

## **COMMENT ANALYSIS:**

After the scoping period ended, comments were then analyzed, summarized and condensed for consideration in the development of an EA. No new issues or information were submitted to the BLM during the scoping process and have been previously discussed and analyzed through the Herd Management Area Plan (HMAP), which was developed in an open and public planning process from 2007-2009. Since this EA tiers off the HMAP, re-examining issues already in the HMAP, such as Appropriate Management Level (AML), range expansion, genetic diversity and natural management were not brought forward. Any comments received not pertaining to a non-helicopter wild horse gather, i.e. signs, shooting closure, speed limits and the use of helicopters also were not summarized. In addition, comments derogatory or accusatory in nature were not brought forward.

Below in Table 1 is a summary of comments received pertinent to development of a gather EA:

**Table 1: Summary of Public Scoping for the Development of an Environmental Analysis for a Non-Helicopter Gather Within the PMWHR.**

<b>Public Input</b>	<b>BLM Response</b>
Deeply concerned about a proposal to remove an unspecified number of horses.	The scoping process was for the use of non-helicopter methods of conducting a gather, not the number of horses to be removed. That information would be addressed during the EA development, which will later be released for public review.
Postpone any gathers until after National Academy of Sciences review	The BLM is still mandated by law to manage wild horse populations and cannot cease due to NAS review. The documented impacts from the wild horses will continue unless managed within the confines of the rangeland and multiple-use mandates.
Provide an alternative for making any removal incremental 10 horses a year until fertility control and natural mortality balance.	The actual number of excess wild horses within the population always depends on the demographics of the herd, not necessarily one fixed number. BLM can consider this alternative.
Provide an alternative for the use of the least intrusive methods such as bait or water trapping, capture of horses in intact social groups to reduce stress.	BLM can easily include a combination of bait-trapping and water trapping methods as an alternative in development of an EA. BLM typically analyzes the impacts to the horses as well during an analysis.
Provide an alternative for relocating removed horses to an eco-sanctuary.	Since every excess wild horse removed from the PMWHR has been successfully placed in private care, relocating removed horses to an eco-sanctuary is most likely not a feasible or necessary alternative to consider.
Provide a full economic analysis of any proposed gather plan including capture cost, adoption preparation, costs for short and long term holding.	An EA is a document designed to disclose the impacts associated with an action. Costs may not necessarily be an impact. Since every excess wild horse ever removed from the PMWHR has been successfully placed in private care, short and long term holding most likely will not apply to the situation.
Provide a full explanation and the scientific documentation to support the premise that an AML of 90-120 is sufficient to maintain genetic viability.	A discussion concerning relationship to planning would be part of an EA. The HMAP is the appropriate place for the documentation concerning the AML.
A full disclosure of all predator killing in and around the Pryor Mountain Range through cooperation with local and national wildlife services.	The PMWHR is closed to predator control. Regulated hunting is managed by the States of Montana and Wyoming's respective wildlife departments. Predator management or wildlife

<b>Public Input</b>	<b>BLM Response</b>
	management is outside the authorities of the BLM; interested parties should contact the appropriate state's wildlife department.
Maintain 50/50 sex ratio no sex ratio skewing.	BLM currently manages the PMWHR herd for a 50/50 sex ratio.
Prohibit permanent sterilization as a means of population control.	The Pryor wild horses are easily treated with fertility control compared to other western herds and easy to capture to maintain a population within AML; therefore, sterilization would not be a feasible tool for PMWHR wild horses on the range.
Manage the wild horse herd for genetic diversity and strength, not for particular physical characteristics.	Within the confines of the law and AML, BLM is managing for as much genetic diversity as possible through the 2009 HMAP.
Do not utilize water-trapping; caution against the use of herding.	BLM can easily include a bait-trapping only alternative in the development of an EA.
Write the EA in a manner that allows for more than one gather and reduce the amount of repetitive EAs in order to allow gathers to occur as necessary.	With the HMAP in place it allows for the development of more focused smaller EAs since much of the management analysis has already occurred. The determination of whether a new EA is needed or not depends on if any changes to the affected environment have occurred or if an action is inconsistent with the most recent analysis.
Support gathering and removal of wild horses utilizing all methods to ensure population management.	BLM can easily include an alternative utilizing all non-helicopter methods in the development of an EA.
Selection of horses for removal should be blind to the romantic naming of individual horses.	BLM could develop a matrix during the development of an EA to identify animals for removal based upon removal considerations in the HMAP.
There is no need for a gather, the population declined by 4%, with the current PZP and the number of older horses the population won't need to be gathered. Continue the use of PZP.	A no action alternative is always part of an EA. Halting PZP would only occur if the HMAP is overturned by a federal court, not part of any gather EA.
Create an alternative that ensures transparency of management and capture operations by providing meaningful public observation during gather operations.	An individual alternative may not be the best way to ensure public observation or transparency. If any action occurs, public viewing will be available.
The EA should include mortality rates for gathers, at facilities, long-term holding, the fates of horses (disposition adopted, long-term holding), veterinary and husbandry issues horses face in short and long-term holding	Since every excess wild horse removed from the Pryors has been successfully placed in private care, there is little chance an animal would end up in either short or long-term holding. So, analysis of mortality rates would be limited to gather operations and pre-

<b>Public Input</b>	<b>BLM Response</b>
	adoption handling.
Include range monitoring data that includes a listing of all horses on the PMWHR, demographics, reproduction rates, distribution, movement patterns, listing of fertility controlled mares, and listing of water sources.	BLM would consider as part of the affected environment any prudent data that describes the current conditions.
Include a complete list of all range enhancements and projects over the last five years.	This information may be part of the affected environment for any EA that is developed.
Any and all wild horses outside the wild horse range should be gathered first and removed.	Any gather operation outside of the PMWHR would require U.S. Forest Service approval.
Recommend that the herd size be taken to the lower limit of the AML to ensure the land resources are being protected.	The current decision in place for the AML is to manage for 120 when fertility control is utilized.
Supportive of a roundup and manage within the AML.	BLM is always striving to fulfill our mission requirements. To successfully accomplish this, the Bureau depends on collaboration and stewardship by those who recognize the value of their public lands and the resources found there.
Roundup by horse back.	BLM may consider the use of horseback work for the action.
Protect Cloud.	The public needs to remember that Cloud is a wild horse and exposed to elements that every wild horse on the range must face to survive. The general health and well-being of all wild horses and their range are Bureau priorities.
Geld all the yearlings.	The Pryor wild horses are easily treated with fertility control compared to other western herds since they are relatively easy to capture and maintain a population within AML; therefore, sterilization would not be a feasible tool for PMWHR wild horses.
Areas with traps have excessive trampling of soil and vegetation. It would be prudent to reseed with appropriate native grasses.	This sounds like a very prudent mitigating measure that can easily be incorporated into an EA.

## CONCLUSION:

Overall many members of the public used the scoping process to provide valuable information, alternatives, mitigation and analysis for the BLM to consider before writing an EA for a non-helicopter wild horse gather.

After the analysis of the scoping comments, development of an EA will begin. The EA is designed to incorporate as much public input from scoping as possible, while still developing a Proposed Action and Alternatives that meet BLM's mandates. Once a preliminary EA is developed, it is released to the public for a 30-day review period. The BLM will then consider public input on the EA and address those comments to complete the final EA. Once the EA is completed and if a decision is issued, the public will have a 30-day period to appeal any action.

## **FINDINGS**

In addition to the scoping comments, the BLM was able to make other valuable findings as follows:

**Finding #1: Few members of the public appear to be aware or understand BLM's current management prescription for the PMWHR or the wild horse herd.** This occurred despite the management prescription being summarized within the scoping notice, as well as the Herd Management Area Plan (HMAP) and subsequent Decision Record that were made available on the BLM Montana/Dakotas website.

The vast majority of comments advocated the BLM to conduct numerous management actions prior to consideration of removals. Almost all actions advocated for are nearly identical to the BLM's current management practices within the PMWHR that are approved and covered by the HMAP. In addition, parties that are litigants against the BLM (asking to have the HMAP set aside) provided comments advocating for actions that could not be possible without the HMAP in place, such as the current fertility control program, water developments, range improvements and genetic considerations.

**Finding #2: There appears to be a misunderstanding of BLM's authorities and obligations.** A common notion amongst the vast majority of commenters in this scoping process insinuates the BLM can set aside plans, laws or regulations to decide on the number of animals to remove outside of the AML without conducting a new analysis of range carrying capacity or consideration of other multiple-use mandates. This is a lack of understanding of the BLM's mission and the federal laws the Bureau must adhere to.

**Finding #3: Many members of the public seem to believe the process is designed to be a referendum.** Instead, the scoping process is designed to gather information that can be used in an environmental analysis for a particular action.